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IN THE UNITED STATES DISTRICT COURT FOR WESTERN DISTRICT OF VIRGINIA CHARLOTTESVILLE DIVISION

DR. ROBERT W. MALONE)
Plaintiff)
v.) Case Number: 3:22-cv-63
PETER R. BREGGIN, MD. GINGER ROSS BREGGIN, AMERICA OUT LOUD, AND DR. JANE RUBY,)))))
Defendants.)))

MOTION TO SEAL ATTACHMENTS

Defendants Dr. Peter R. Breggin, MD and Ginger Ross Breggin (collectively, "the Breggins," or "the defendants"), through undersigned counsel, and pursuant to Local Rule 9 of the Local Rules for the United States District Court for the Western District of Virginia, moves to seal defendants, Dr. Peter R. Breggin and Ginger Ross Breggin, attachment to Document 68-1 and 70-1. As support for this motion, the defendants state as follows:

1. Counsel for the Breggins is currently serving in the Virginia General Assembly as a state senator and is away from his law firm at this time. Counsel's legal assistant inadvertently filed a copy of the firm's American Express account billing statement that has now become Attachment 68-1 and 70-1 in the Pacer system in this case. These documents have nothing to do with the above-styled matter, are irrelevant to any matter currently before the Court, and were filed erroneously. The documents contain sensitive financial information regarding

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the firm and its clients that are not for public dissemination. The law firm has a privacy interest in these documents which require sealing them from public access.

WHEREFORE, your Defendants, by the undersigned counsel, respectfully pray that their motion be granted.

Respectfully Submitted,

PETER R. BREGGIN, MD. GINGER ROSS BREGGIN By Counsel

By /s/ William M. Stanley
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CERTIFICATE

I hereby certify that on the 26th day of January, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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Attorneys for Defendant Dr. Jane Ruby

By /s/ William M. Stanley